

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

IN RE:	§	
	§	Case No. 22-60043
FREE SPEECH SYSTEMS, LLC,	§	
	§	Chapter 11 (Subchapter V)
Debtor	§	

STIPULATION AND AGREED ORDER

The above-captioned debtor and debtor-in-possession (the “**Debtor**”) and Neil Heslin, Scarlett Lewis, Leonard Pozner, Veronique De La Rosa, and Marcel Fontaine (the “**Texas Plaintiffs**”) and David Wheeler, Francine Wheeler, Jacqueline Barden, Mark Barden, Nicole Hockley, Ian Hockley, Jennifer Hensel, Donna Soto, Carlee Soto Parisi, Carlos M. Soto, Jillian Soto-Marino, William Aldenberg, William Sherlach, and Robert Parker (the “**Connecticut Plaintiffs**”) (together with the Texas Plaintiffs, the “**Sandy Hook Families**”) hereby enter into this stipulation and agreed order (“**Stipulation**”) as follows:

WHEREAS, on July 29, 2022 (the “**Petition Date**”) [Dkt. 1], the Debtor filed a voluntary petition for relief under subchapter v of chapter 11 of title 11 of the United States Code in the United States Bankruptcy Court for the Southern District of Texas (the “**Bankruptcy Court**”);

WHEREAS, on August 12, 2022, the *Subchapter V Deadlines Order* [Dkt. 65] was entered setting the deadline for the Debtor to file a plan of reorganization (the “**Plan**”) for October 27, 2022;

WHEREAS, on October 21, 2022, the Debtor filed its *Emergency Motion for Extension of Time to File a Plan of Reorganization* [Dkt. 246], requesting an extension to file its Plan;

WHEREAS, on October 25, 2022, the Court entered the *Order Granting Motion for Extension of Time to File a Plan of Reorganization* [Dkt. 254], which extended the deadline for the Debtor to file its Plan until December 16, 2022; and

WHEREAS, the Debtor and the Sandy Hook Families have agreed to a corresponding extension of the deadline to object to dischargeability pursuant to any potentially applicable law, including, but not limited to 11 U.S.C. § 523(c), which is currently set for November 7, 2022,¹ and without agreeing to the applicability of same. All parties expressly reserve their rights regarding same.

NOW, THEREFORE, IT IS STIPULATED BY THE PARTIES AND, UPON APPROVAL BY THE BANKRUPTCY COURT, ORDERED THAT:

1. The deadline to object to dischargeability of the Debtor pursuant to 11 U.S.C. § 523(c) and any other potentially applicable law is extended to January 5, 2023.

Signed: _____

Christopher Lopez
United States Bankruptcy Judge

¹ See *Notice of Chapter 11 Bankruptcy Case* [Dkt. 53-1]; see also Fed. R. Bankr. P. 4007(c) (“[A] complaint to determine the dischargeability of a debt under §523(c) shall be filed no later than 60 days after the first date set for the meeting of creditors under §341(a)”).

STIPULATED AND AGREED ON OCTOBER 28, 2022 BY AND AMONG:

THE CONNECTICUT PLAINTIFFS

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THE TEXAS PLAINTIFFS

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FREE SPEECH SYSTEMS, LLC

 /s/ *Raymond W. Battaglia*

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